

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO (ALBUQUERQUE)

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROY HEILBRON,

Defendant.

Crim. No. CR 15-2030 WJ

CURRENT SENTENCING DATE: [7-11-17]
[PROPOSED] SENTENCING DATE: [8-28-17]

MOTION FOR A CONTINUANCE
OF THE JULY 11, 2017 SENTENCING DATE

The defendant Roy Heilbron, respectfully moves this court for a continuance of the current sentencing date of July 11, 2017 based on the following:

1. Defendant entered a plea of guilty to Count 4 of the Indictment.
2. The Court set a sentencing date of June 28, 2017. That date was thereafter continued per Court sentencing Order to July 11, 2017.
3. Defendant is released on bond pending sentencing.
4. The defendant requests the continuance based upon the following facts: defendant's counsel is commencing a trial in federal district court in Syracuse on July 12, 2017. The case is entitled, *United States v. Andrew Raymond, et al.*, Case No. 5:15-cr-00081-NAM.
5. The case is scheduled to last at least two (2) weeks.
6. I have discussed the scheduling conflict with AUSA Jeremy Pena, who has no objection to a continuance of the hearing date to August 28, 2017.
7. Based on the foregoing, counsel for defendant represents that additional time is necessary to continue and prepare for sentencing.

1 Dated: June 6, 2017

2 Respectfully submitted,

3 MARKS & BROOKLIER, LLP

4 /s/ Donald B. Marks

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